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March 16, 2021

Via ECF To:

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower, 18th Floor
Philadelphia, PA 19103

**RE: *In re Valsartan Products Liability Litigation*, U.S. District Court
District of New Jersey, Camden Division, No. 1:19-md-02875**

Dear Special Master Vanaskie:

Pursuant to Your Honor's ruling during the March 10, 2021 mid-month conference,
kindly accept this status report on behalf of Aurobindo Pharma Ltd. regarding their collection of
custodial documents located in India:

1. Aurobindo Pharma Ltd. has been unable to transfer the files via an FTP site due to their size.
2. On March 1, 2021, at Aurobindo Pharma, Ltd.'s directive, KLDISCOVERY mailed encrypted hard drives to obtain custodial documents related to this litigation. *See FedEx Tracking report for tracking number 773032657808*, a true and correct printout of which is attached hereto as Exhibit "A."
3. On March 5, 2021, Aurobindo Pharma, Ltd. received notice that there was a customs hold on the shipment. *See Id.*

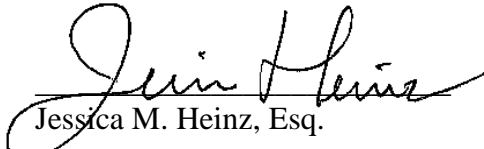
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4. After receiving the hold notification, Aurobindo Pharma, Ltd. attempted to resolve the issue, without success, and no clearance took place.
5. On March 11, 2021, the day after the mid-month conference, Aurobindo Pharma, Ltd. requested immediate shipment of replacement encrypted hard drives.
6. On March 12, 2021, the replacement hard drives were shipped via FedEx Priority International Shipping, tracking number 939968534913. *See FedEx Tracking report for tracking number 939968534913*, a true and correct printout of which is attached hereto as Exhibit "B."
7. Additionally, another set of replacement hard drives was shipped from the United Kingdom via DHL. *See DHL proof of mailing for US103_135117*, a true and correct copy of the label is attached hereto as Exhibit "C."
8. KLDDiscovery is prepared to sign an affidavit regarding the events that transpired regarding the shipments of the encrypted hard drives.
9. Aurobindo Pharma, Ltd. is making every effort to obtain clearance for the shipments currently held in customs.

Thank you very much for your time and attention to this matter.

Respectfully Submitted,

CIPRIANI & WERNER, P.C.


Jessica M. Heinz, Esq.

Enclosures

Cc: All counsel of record (via ECF)